

Information from Wisconsin
Department of Natural Resources Bureau
for Remediation and Redevelopment

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BROWNFIELDS SITE ASSESSMENT GRANT APPLICATIONS AVAILABLE

Applications for state brownfields grants to help communities revitalize blighted properties are now available through the Wisconsin Department of Natural Resources (DNR).

The DNR's Brownfields Site Assessment Grant (SAG) program has \$3.4 million in available funding over the next two years to help local governments jump start environmental activities at brownfields. Brownfields are abandoned, idle or underused industrial or commercial properties where redevelopment is hindered by real or perceived contamination.

Applications and instructions for the first \$1.7 million are available from the DNR Remediation and Redevelopment (RR) Program. Applications for both large and small grants are due February 13, 2004.



BROWNFIELDS SITE ASSESSMENT GRANT APPLICATIONS AVAILABLE (con't.)

"This is a very successful program that helps grow Wisconsin's economy,' said Mark Giesfeldt, RR bureau director. "We encourage every municipality interested in turning their blighted properties into economic assets to apply for these grants."

The funding has helped communities begin investigation and cleanup at 554 acres in 84 communities across the state since 1998. These activities included more than 210 site assessments and investigations, the removal of 162 underground storage tanks and the demolition of nearly 200 structures and buildings.

"The SAG not only allows local officials to take the first steps toward brownfields cleanup, it also helps communities bring these properties back into productive economic use," said Giesfeldt.

Giesfeldt added that many of the properties receiving SAG's have been redeveloped, including:

- the new Baraboo City Services Center, a \$5 million, 65,000-square foot facility that stands on land once used for salvage and railroad operations;
- the former Marathon Rubber site in Wausau, which local officials turned into a neighborhood park and low to medium income housing; and
- the New Rockline Industries manufacturing facility, located in Sheboygan. The plant, which produces coffee filters, is located on the former R-Way Furniture factory site; the Rockline facility is 100,000 square-feet, cost approximately \$2 million, and provides 124 jobs to the community.

Local governments – which include cities, villages, towns, counties, tribes, and redevelopment, community and housing authorities – are eligible to apply for the SAG. While the SAG does not fund cleanup activities, it does fund the following activities:

- Phase I Environmental Site Assessments:
- Phase II Environmental Site Assessments;
- site investigations;
- asbestos removal associated with demolition;
- removal of abandoned containers; and
- removal of underground storage tanks (USTs).

Of the \$1.7 million authorized this fiscal year, \$1.19 million is allocated for small grants and \$510,000 is allocated for large grants. Small grants range from \$2,000 up to \$30,000 and large grants range from \$30,001 up to \$100,000. Another \$1.7 million will be available for the SAG next fiscal year, which begins July 1, 2004.

The State Legislature first authorized \$1.45 million for the SAG program in the 1999-2001 State Biennial Budget after the Brownfields Study Group, a state-wide advisory task force, recommended the program in their 1998 final report.

For more information about the SAG program, please visit the RR web site at www.dnr.state.wi.us/org/aw/rr/rbrownfields/sag.htm, or contact Michael Prager at 608-261-4927, or michael.prager@dnr.state.wi.us.

NEW RR PILOT PROGRAM STREAMLINES RANKING OF CONTAMINATED SITES

As with many programs in the DNR, RR program staff need to establish priorities for conducting their work with contaminated properties. Chapter NR 710, Wis. Adm. Code, includes a "hazard ranking system" for DNR staff use to create the hazard ranking list that is required by s. 292.31 (1)(c), Wis. Stats.

However, program staff, consultants and other customers have realized that the current NR 710 ranking system is a very complicated and time-consuming method to prioritize individual sites. In addition, the ranking system does not work for some types of RR Program sites.

In 2002, a small RR work group developed a pilot program to simplify how staff prioritize contaminated sites. The pilot priority system (PPS) is now being utilized to assist staff with funding decisions for the Dry Cleaner Environmental Reimbursement Fund (DERF) and the State Funded Response (SFR) portion of the Environmental Fund.

"This pilot program has streamlined our decision-making and saved RR managers and staff considerable time," said Mark Giesfeldt, RR Bureau director.

The PPS provides a relatively simple process applying environmental risk and socioeconomic factors to a wide variety of RR sites. The environmental risk portion considers the amount and type of contaminants and their impacts to environmental receptors through groundwater, surface water/sediments, air, and soil/direct contact pathways. Socioeconomic factors include economic distress, economic enhancement, beneficial use, population served, and partnerships.

Using this new system, staff can rank or screen a site (based on readily available information) in 30 minutes or less, and thereafter quickly assigned to a high, medium, or low priority classification. In the past, the NR 710 hazard ranking system generally required several hours of staff time to rank a site.

The RR program successfully ran the pilot system in 2002 and 2003 for the DERF and SFR. For DERF, the system's environmental risk scoring ranges coincide with DERF funding percentages for high, medium, and low risk categories. For SFR, separate scores for environmental risk and socioeconomic factors are used with other information to select state lead projects for funding.

Program managers plan to continue the pilot in these program areas and possibly expand the system into selected site inventory efforts in 2003 and 2004. However, the program will not proceed with rulemaking amending NR 710 until more experience with the pros and cons of the pilot priority system is obtained. For more information about the PPS, please contact Dick Kalnicky at 608-267-7554 or richard.kalnicky@dnr.state.wi.us.

COMPLETE SITE INVESTIGATION AND CLOSURE REPORTS - WHAT'S MISSING?

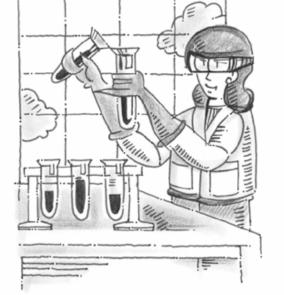
For many years the Remediation and Redevelopment (RR) Program has worked with its customers to turn around site investigation (SI) reports and closure requests as quickly as possible to help responsible parties move ahead with the cleanup and reuse goals for their property.

In doing so, staff have noticed that, for the majority of denials for site closure, most are due to inadequate site investigation work. It is frustrating for RR staff, as well as for owners and consultants, to find out near the end of a cleanup that additional site investigation work remains to be done. This article summarizes the "puzzle pieces" that are most commonly missing when closure requests are reviewed (previous articles have also addressed this issue; please see "Case Closure With Residual Free Product – Can You Get There From Here?", page 1, *Re News*, December 2002).

1. Definition of the horizontal and vertical extent of contamination. This includes defining the extent of soil

contamination, the groundwater contaminant plume, and free product.

- a. Soil contamination. After tank or soil removal, soil samples should be taken on all four sides and at the base of the excavation. This information often determines whether a property is listed as a contaminated site. For site investigations, further soil sampling may be necessary to determine the extent of the release. Some soil sampling should be done within four feet of the surface so that a direct contact threat can be assessed. Soil samples should also be taken across property lines, if there is an indication that free product or other hazardous substances have migrated from the originating property.
- **b. Groundwater plume.** Groundwater plumes should be defined vertically and horizontally. Piezometers are necessary at almost all sites to determine vertical gradients



and contaminant movement at depth. Defining the edge of the plume is also critical – in fact, natural attenuation cannot be established as a remedy unless it can be shown that the plume margin is stable or receding.

Too often, there are large distances between the last, often highly contaminated, well within the plume and the clean downgradient well. Without monitoring wells near the edge of the plume, it may take many years of monitoring before it can be established that the plume margin is stable. Staff recognize that monitoring wells can't always be placed in a preferred location, and that wells located across property boundaries or in rights-of-way (ROWs) can also present problems.

However, consultants or owners may contact DNR staff to request agency help in gaining access to critical monitoring locations or to help determine alternative ways to establish an adequate monitoring well network.

COMPLETE SITE INVESTIGATION AND CLOSURE REPORTS - WHAT'S MISSING? (CON'T.)

- c. Free product definition. The horizontal and vertical extent of free product for both light and dense non-aqueous phase liquid (LNAPL and DNAPL) needs to be established when free product is present. Free product monitoring, abatement and disposal should be described.
- 2. Possible receptors identified and defined. Municipal and private wells near contaminated properties need to be identified and located on maps of the contaminated site. Well construction reports and current sampling data (where available) should be included in an SI and closure report. If a surface water body is close to the contaminated site, contaminant movement toward or into the surface water needs to be identified and possible impacts assessed. Vapor migration to buildings may also need to be investigated.
- 3. **Utilities identified**. Utility corridors on-site or near a contaminated site should be identified and their locations indicated on site maps. Site investigation reports should detail the evaluation procedure used to determine the risk of contaminant migration through or along the utility corridors.
- 4. Consistent groundwater monitoring data. Many contaminated sites are being evaluated for natural attenuation. A consistent monitoring program is critical to assessing contaminant trends. Other issues to be aware of regarding groundwater data include proper collection and reporting of Quality Assurance/Quality Control (QA/QC) data, and submitting data in formats that are easy to read and contain all the necessary information (including detection limits, Preventive Action Limits (PAL), Enforcement Standards (ES), and duplicate sample analyses, etc.).

The first round of groundwater monitoring for petroleum contamination should include a full volatile organic compound (VOC) scan to identify all contaminants; subsequent sampling can consist of petroleum VOCs if no other compounds of concern are identified. Similarly, for other types of contamination, start with a broad analytical protocol and ask the DNR project manager about reducing the parameters based on what turns up in the initial sampling.

- 5. Data presentation. "A picture is worth a thousand words" is an apt description of the importance of figures and tables to site investigation and closure reports. Accurate, legible site maps; geologic cross-sections, isoconcentration maps, and tables help speed the review process. Summary data tables should include all soil and groundwater data from the start of the project. Appendices should contain groundwater monitoring well forms with signatures and Wisconsin Unique Well Numbers (WUWN), soil boring logs (for all borings, regardless of depth), abandonment forms, chain of custody forms, and other critical information. Wells should be properly surveyed using national geodetic datum.
- 6. Complete closure forms and GIS packets. Status updates, including groundwater monitoring results, should be submitted to the DNR as site cleanup work progresses. However, all the data should be pulled together by the consultant into a single report when seeking a regulatory decision. A site investigation report or closure report should be a stand-alone document that contains all the information required by administrative code for a "complete" submittal. A DNR closure form should accompany each closure submittal, including resubmitted requests. The GIS packages are also stand-alone documents, even though some of the information required in the GIS packet is repeated in other sections of the closure report.



SUCCESS STORIES

REACHING FOR THE STARS - GREEN BAY DRY CLEANER, DNR PARTNER WITH POLLUTION PREVENTION PROGRAM

As the old adage goes, "Knowledge is Power" (Hobbes). Dennis Schmitt, owner and operator of Lindeman's Cleaning, Inc., in Green Bay, couldn't agree more. Using this philosophy, Schmitt has educated himself over the past 29 years on the ins and outs of the dry cleaning business. Empowering himself and his staff with the knowledge of how to serve customers while bettering the environment has earned Lindeman's a five star rating, the highest achievable, from the Wisconsin Five Star Program.

Wisconsin's Five Star Program is part of a larger program called the Pollution Prevention Partnership between the DNR, Wisconsin Fabricare Institute, UW-Extension, Department of Commerce and the Center for Neighborhood Technology. The program ranks participating dry cleaners in Wisconsin on a scale of one to five stars (see box on page 7). It builds upon the pollution prevention requirements of the Dry Cleaner Environmental Response Fund Program (DERF) statute, s.292.65, Wis. Stats., and is designed to help demonstrate to customers the commitment of a dry cleaner to be more environmentally friendly.

Schmitt says the motivation behind going for the five star rating came from wanting to better his business and the industry and so, in his words, "I can put my head to the pillow and know I did my very best". He added that, since obtaining the five star rating in 2002, he has been promot-

ing the five star program, which has brought him new customers and respect for the industry.

Gaining the five star rating has been a positive experience for Schmitt and his staff. He noted that open lines of communication established

between dry cleaners, DNR officials, UW-Extension staff and other involved parties have made it a positive, nonintimidating process.

When asked what he would say to other dry cleaners looking to become five-star certified, Schmitt says not to worry: "The process is not cumbersome – it's an investment for a brighter tomorrow, and the knowledge gained from achieving the rating is good for business and the industry."

Currently, Lindeman's Cleaning is one of four dry cleaning businesses to earn a five-star rating. The others:

- One Hour Martinizing (Hartford, WI);
- Packard Cleaners (Cudahy, WI); and
- Stannard Dry Cleaners and Launderers (Oshkosh, WI).

A comprehensive map of dry cleaners enrolled in the Five Star Program and information on how to enroll in the program can be found at\www2.dnr.state.wi.us/org/caer/cea/assistance/drycleaning/5star.index.htm.

So the next time you drop off your dry cleaning – look for the stars!

REACHING FOR THE STARS - GREEN BAY DRY CLEANER, DNR PARTNER WITH POLLUTION PREVENTION PROGRAM (CON'T.)



Dennis Schmitt, owner and operator of Lindeman's Cleaning, Inc., in Green Bay, stands in front of a dry cleaning machine. This machine was purchased a year ago and meets the five star rating requirements (photo by Michelle Stokes, DNR).



As part of Wisconsin's Five Star Program, chemical containers must be stored on a catch basin to stop fluids from spilling on to the floor or down a floor drain (photo by Michelle Stokes, DNR).

Wisconsin's Five Star Program

Wisconsin's Five Star Program is part of the Pollution Prevention Partnership between the DNR, Wisconsin Fabricare Institute, UW-Extension, Department of Commerce and the Center for Neighborhood Technology. The program ranks participating dry cleaners in Wisconsin on a scale of one to five stars, based on the criteria listed below, and gives recognition to dry cleaners willing to do more than what is required by regulation to protect the environment.

One Star

- Adopts the principles of the Wisconsin Drycleaners Project focusing on pollution prevention and regulatory compliance
- Demonstrates compliance with environmental and workers health and safety regulations
- Strives to reduce the use of solvent mileage (i.e. solvent use)
- Attends one technical fabricare or one environmental program per year
- Complies with environmental regulations
- · Responds openly and honestly within a reasonable time frame to questions by neighbors/customers regarding solvent

Two Star

- Qualifies as a one-star dry cleaner
- Provides information on the Five Star Program
- Attends one technical fabricare and one environmental management program per year
- Has a written spill prevention policy and appropriate spill cleanup materials and response procedures in place

Three Star

- Qualifies as a two-star dry cleaner
- Recycles plastic garment bags and/or recycles or reuses hangers that are returned from customers
- Achieves a solvent mileage of 400 pounds per gallon of perchloroethylene, 70 pounds per gallon for petroleum and posts the percentage of wet cleaning done to serve as a replacement for traditional solvent cleaning
- Attends one state or regional fabricare conference per year
- Passes either the International Fabricare Institute (IFI) or the Wisconsin Fabricare Institute (WFI) dry cleaner exam
- Conducts a regulatory self-compliance audit and submits results to WFI

Four Star

- Qualifies as a three-star dry cleaner
- Achieves a solvent mileage of 500 pounds per gallon of perchloroethylene, 80 pounds per gallon for petroleum or achieves at least 20 percent of wet cleaning as a replacement for traditional solvent cleaning and posts that information

Five Star

- Qualifies as a four-star dry cleaner
- Achieves a solvent mileage of 600 pounds per gallon of perchloroethylene, 100 pounds per gallon for petroleum or achieves at least 25 percent of wet cleaning as a replacement for traditional solvent cleaning and posts that information
- Demonstrates superior environmental performance and recognized by the Five Star Committee
- Implements and maintains an employee health and safety air monitoring program
- Conducts and passes a third-party compliance audit

BLOOMER SITE BENEFITS FROM SPILL PREVENTION

Wisconsin's Spill Law, Section 292.11, Wis. Stats., gives the DNR authority to require cleanup of hazardous substances that are released to the environment. While many communities and individuals involved in spill cleanups are aware of this authority, they may not know that the law also gives

> the department the authority to require spill prevention. Under s. 292.11 (4), Wis. Stats., DNR staff can require that preventive measures be taken if staff finds that existing control measures are inadequate to prevent discharges of hazardous substances to the environment.

North of Bloomer in northwestern Wisconsin, Bloomer Co-op Feeds supplies a full line of feeds, fertilizer and pesticides to the agricultural community. The Co-op also provides fertilizer and pesticide application services. The facility has numerous pesticide and liquid fertilizer tanks on the property. Duncan Creek, a Class 1 brook trout stream, is located on the eastern boundary of the Co-op property, and the surface drainage pattern from this property runs directly to the banks of Duncan Creek.

As a result of hazardous substance releases in the past and due to concerns by the local field warden, staff from the RR Program recently did an investigation at the Bloomer Co-op facility.

During the investigation, staff observed a fertilizer wagon that had rolled down the embankment to the edge of the stream (no material was spilled). Using the Spill Law authority, the department requested that Bloomer Co-op Feeds provide an effective barrier between their facility and the creek that would allow any spilled material to be recovered before it reached the stream, and would also prevent any Coop equipment from entering the stream.

The Co-op manager submitted a plan to construct an earthen berm that ran the length of their property adjacent to the stream. Once DNR approved the plan, the Co-op constructed a berm 16 feet wide at the base, four feet high and four feet wide on top (please see photo). The berm effectively ponds all of facility's storm water and associated contaminants at the base of the berm and prevents it from entering the stream directly. In the case of a future release, they have the ability to capture the released material before it enters the stream.



In past spill prevention efforts, many requirements have Berm constructed at the Bloomer Co-op Feeds facility (photo by John Grump, DNR).

been instituted in an industrial setting within the walls

of a factory or plant. This example shows that, with the cooperation of property owners working alongside DNR staff, spill prevention can also be an effective tool in a rural setting to protect a high quality stream.

For more information about DNR spill prevention and spill cleanup, please contact Robin Schmidt at 608-267-7569, or robin.schmidt@dnr.state.wi.us.

DNR Awards First Green Space Grants

This December the DNR announced the recipients of the agency's first Greenspace and Public Facilities grants. The grants provide funding to communities to help turn former brownfields into parks, trails, natural areas, libraries, and other public amenities.

Mark Giesfeldt, RR bureau director, noted the high demand for the program. "About twice as many applications for the Greenspace grants were submitted than we are able to fund," said Giesfeldt. "This is similar to the demand for other brownfield programs like the Site Assessment Grants."

Final awards for the Greenspace grants were not available at press time. However, please check the RR Program's web site to see the grant recipients at: www.dnr. state.wi.us/org/aw/rr/rbrownfields/greenspace_grant.htm.

Giesfeldt noted that the Greenspace grant program is one of the only programs of it kind in the nation, and was approved by the State Legislature during the 2001-2003 biennial budget process. The program was recommended to the Legislature by the Brownfields Study Group, a state-wide task force created in 1998 to work on improving and enhancing Wisconsin's brownfields initiatives.

Grant funds can be used for the following activities:

- environmental assessments and initial sampling of contaminated lands;
- environmental investigation; and
- developing control and cleanup measures for contaminated soil and groundwater.

Staff from the RR Program, with assistance from DNR attorneys, completed the administrative rules, held public hearings and announced the first competition for \$1 million in grants in October, 2002. The RR Program received 18 applications totaling nearly \$2 million, but due to the state budget deficit, funding for the program was utilized, along with other state funds, to help cover the fiscal gap.

In 2003, legislators again authorized \$1 million in the 2003-2005 State Biennial Budget for the Greenspace Grant Program, and specified that the applications received in the previous biennium were to be reconsidered at this time.

For more information about Greenspace and Public Facilities grants, as well as other brownfields funding, please visit the "Financial" section of the RR Program's web site at www.dnr.state.wi.us/org/aw/rr. You may also contact Michael Prager at 608-261-4927, or michael.prager@dnr.state.wi.us.

Wisconsin's "Ready for Reuse" Initiative



The RR Program is working with other public agencies in Wisconsin to create the Wisconsin Brownfields Coalition (WBC). The WBC has applied to EPA for a grant to establish a statewide revolving loan fund (RLF) that would provide federal funds to local governments in Wisconsin to investigate and clean up brownfield properties.

The RLF would provide sub-grants and low- or no-interest loans to local governments, including counties, cities, villages, towns, and tribal authorities. Using these funds, local governments could "jump start" redevelopment at brownfield properties, and

also partner with developers to leverage private investment at brownfield trouble spots in the community.

Many Wisconsin communities have brownfields, including old gas stations, abandoned factories and underused commercial facilities in visible locations downtown, along waterfronts or adjacent to major thoroughfares. These projects could become "ready for reuse" as commercial, industrial, residential or green space sites. Some local governments have applied directly to EPA for federal grants for assessment and cleanup of brownfields, or to establish their own revolving loan fund. A RLF of several million dollars that is administered by the state would help other local governments access these federal funds.

For more information about federal grants, please see our "Financial" web pages at www.dnr.state.wi.us/org/aw/rr. The WBC's application to EPA, if funded, could provide money to Wisconsin communities by the fall of 2004. If you would like more information, please contact Percy Mather at 608-266-9263, or percy.mather@dnr.state.wi.us.

Wisconsin's Leads Nation Using Brownfields Tax Deduction; Incentive May Sunset by January 1, 2004

Unless Congress acts to extend its life beyond 2003, a federal brownfields tax incentive in existence since 1997 is set to expire at the end of this year. Wisconsinites have used the deduction 21 times, which leads the nation.

The tax incentive is available to individuals and businesses with contaminated sites that are used in trade or business. Taxpayers, including responsible parties, can deduct all their "qualified" environmental remediation expenses at those contaminated sites in the year that the expenses were incurred.

Highlights of the deduction include:

- a taxpayer must incur eligible expenses while holding a property for the production of income or for use in a trade or business:
- the deduction is available for expenses through the end of 2003 for the tax year in which the expenses were incurred;
- deductible expenses include site assessment, investigation and monitoring, remediation, operation and maintenance, voluntary party liability exemption (VPLE) fees, and costs incurred for the removal of demolition debris;
- the property may not be on the federal Superfund's National Priorities List (NPL);
- a federally defined hazardous substance must be present or potentially present on the property; this excludes the deduction of expenses for abatement or control of petroleum, or products that are part of a building (such as lead paint or asbestos) under the definition of a hazardous substance in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980; and
- the taxpayer must obtain a statement from DNR that the property meets the hazardous substance release, threatened release or disposal requirements. The one-page form (Form 4400-206) is available on the RR web site at www.dnr.state.wi.us/org/aw/rr/archives/pubs/4400.206.pdf.

Wisconsin Leads Nation Using Federal Brownfields Tax Deduction; Incentive May Sunset by January 1, 2004 (con't.)

A tax advisor can provide more information on specific eligible costs. Currently, the U.S. House of Representatives has a bill introduced to extend the deadline for the tax deduction, but there is no companion bill in the Senate, and it appears unlikely Congress will act on the measure before the end of the year.

To get more information about DNR's certification, check out the RR web site at www.dnr.state.wi.us/org/aw/rr/financial/fed_tax.html, or contact Percy Mather at 608-266-9263, or percy.mather@dnr.state.wi.us. Also, please see "Brownfields Tax Deduction Could Mean Savings For You!", page 9, *Re News*, December 2002.

RR Program's Northeast Region to Host Consultant's day

The DNR's RR Program and the Federation of Environmental Technologist (FET), Inc., are co-sponsoring a one-day seminar for environmental consultants dealing with contaminated properties on Wednesday, March 31st, 2004, at Liberty Hall, 800 Eisenhower Drive, Kimberly.

Registration will be from 8-8:30 a.m. Costs include: \$90 for attendees and \$60 for DNR and Department of Commerce staff; fee includes lunch. Registration materials were made available in late November. Please check the upcoming FET newsletter and the RR electronic newsletter (listserv) for agenda topics and registration forms. For additional infor-

mation, please contact FET at 262-644-0070, or fet@hnet.net.

RR STAFFER NAMED NORTHEAST REGION'S AIR & WASTE DIVISION EMPLOYEE OF THE YEAR

Jennie Pelczar, an RR Program hydrogeologist located at the DNR's Oshkosh office, was named the Air and Waste Division's Employee of the Year for the Northeast Region. Jennie has been with the RR Program since April, 1999. Congratulations Jennie!



DNR BALDWIN SERVICE CENTER MOVES

The DNR Service Center in Baldwin, formerly located at 990 Hillcrest Drive, has moved to a new location. The Department has leased space in a new building at 890 Spruce Street in Baldwin. The main telephone number remains the same, 715-684-2914, and all DNR staff also remain at the same telephone numbers and extensions. The center is closed on Mondays and open Tuesday through Friday, 8:15 a.m.-1 p.m., and 2-4 p.m.

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For More Information: Re News is published quarterly by the Wisconsin Department of Natural Resources Bureau for Remediation and Redevelopment.

This newsletter is available in alternate format upon request. Please call 608-267-3543.

Our Web Site Is: http://www.dnr.state.wi.us/org/aw/rr

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The Wisconsin Department of Natural Resources provides equal opportunity in its employment, programs, services and functions under an Affirmative Action Plan.

This newsletter contains information about certain state statutes and administrative rules and does not include all of the details found in the statutes and rules. Readers should consult the actual language of the statutes and rules to answer specific questions.

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